

SNAPS-Shots

Bite-Size Information on the Emergency Solutions Grants and Continuum of Care Programs

July 2, 2013

Assigning Essential Services to the Appropriate Program Component

Did You Know?

In the ESG Program, recipients/subrecipients may provide essential services under both the Street Outreach and Emergency Shelter components. However, the specific allowable costs under each component depend on **the population being served** and **where the services are provided**.

- **Unsheltered homeless persons** staying on the streets or in other places not meant for human habitation can receive:
 1. Non-facility based essential services on the street, parks, or other locations where unsheltered persons may be staying, under the Street Outreach component, and
 2. Essential services in an emergency shelter, under the Emergency Shelter component.
- **Persons staying in an emergency shelter** can receive essential services, under the Emergency Shelter component:
 1. In an emergency shelter, and
 2. At another site, such as a child care center for children under 13 who are staying in a shelter.

Note: See [FAQ 2238](#) for requirements for a day shelter to qualify as an emergency shelter.

What Services Can Be Provided?

The following table summarizes and compares the essential services allowable under each component:

Street Outreach	Emergency Shelter
Engagement	--Not eligible--
Case Management	Case Management
--Not eligible--	Child Care
--Not eligible--	Education Services
--Not eligible--	Employment Assistance/Job Training
Emergency Health Services	Outpatient Health Services
--Not eligible--	Legal Services
--Not eligible--	Life Skills Training
Emergency Mental Health Services	Mental Health Services
--Not eligible--	Substance Abuse Treatment Services
Transportation	Transportation
Services for Special Populations	Services for Special Populations

Services eligible under the Emergency Shelter component are more expansive than the Street Outreach component because of the population being served and where they are located. Be sure to review the [ESG Program Interim Rule](#) for detailed descriptions of the essential service costs that are eligible under each

SNAPS-Shots

Bite-Size Information on the Emergency Solutions Grants and Continuum of Care Programs

component, to understand where they are similar and where they differ (24 CFR 576.101 and §576.102). Below are two examples.

Health and mental health services are allowable under both components, to the extent that other appropriate services are unavailable or inaccessible within the community. However, for Street Outreach, these services **must be of an emergency nature**. For example, note the differences in the types of allowable health services under each component:

- Under the Emergency Shelter component, eligible costs for Outpatient Health Services include “assessing a program participant’s health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services....and providing preventive and noncosmetic dental care.”
- Under the Street Outreach component, eligible costs for Emergency Health Services “are for the direct outpatient treatment of medical conditions.”

Second, transportation activities are similar and allowable under both components, but **only** when linked with other activities allowed under the component. That is, the service provider may only provide transportation assistance to and from another eligible service (though the recipient/subrecipient is not required to fund such services). For example:

- Under the Emergency Shelter component, a shelter provider could use ESG funds to lease a van or provide bus passes for shelter residents to get to and from medical appointments, employment, or child care.
- Under the Street Outreach component, a provider could use ESG funds to lease a van used for a doctor to travel to and provide emergency health services to persons on the street.

Keep in mind: in general, if it’s not listed in the regulation, it’s not eligible!

Please note: This SNAPS-Shot is provided as a resource to help recipients and subrecipients understand the ESG Program Interim Rule. Always refer to the program regulations to ensure compliance with program requirements.

Related Resources

For more information on this issue, see the [ESG Program Interim Rule](#) at §576.101 (Street Outreach) and §576.102 (Emergency Shelter), and HUD’s [Emergency Solutions Grants Program Components and Activities](#) webinar.

Ask A Question

If you have questions or suggestions for SNAPS-Shots topics, please submit them to HUD via [OneCPD Ask A Question](#) help desk.